

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and
IME MANAGEMENT & CONSULTING LLC,

Defendants.

-----X

Jamie S. Felsen, Esq. declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that the following is true and correct:

1. On July 18, 2025, I served the enclosed July 18, 2025 Text Order on Jonothan Warner, Esq. by email to jdwarner@wslaw.nyc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 18, 2025

/s/ Jamie S. Felsen

Case No.: 1:22-cv-1032 (PKC) (JRC)

DECLARATION OF SERVICE

From: [Jamie Felsen](#)
To: [Jonathon Warner](#)
Cc: [Emanuel Kataev](#)
Subject: FW: Activity in Case 1:22-cv-01032-PKC-JRC IME WatchDog, Inc. v. Gelardi et al Scheduling Order
Date: Friday, July 18, 2025 12:36:00 PM

Jonathon,

See below Order.

Jamie S. Felsen - Partner
Milman Labuda Law Group PLLC
3000 Marcus Ave., Suite 3W8
Lake Success, NY 11042
Telephone (516) 328-8899
Fax (516) 328-0082

This information contained in this message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication, and as such, is privileged and confidential. If the reader of this message is not the intended recipient, you are hereby notified that you have received this message and the enclosed documents in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, please notify me immediately. Thank you.

From: ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
Sent: Friday, July 18, 2025 12:32 PM
To: nobody@nyed.uscourts.gov
Subject: Activity in Case 1:22-cv-01032-PKC-JRC IME WatchDog, Inc. v. Gelardi et al Scheduling Order

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

*****Additional Security Enhancements Coming Soon*** For information visit PACER website**

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 7/18/2025 at 12:32 PM EDT and filed on 7/18/2025

Case Name: IME WatchDog, Inc. v. Gelardi et al

Case Number: [1:22-cv-01032-PKC-JRC](#)

Filer:

Document Number: No document attached

Docket Text:

ORDER: In the Court's Second Attachment Memorandum & Order, (Dkt. [500]), issued on May 30, 2025, the Court found that Defendants Safa and Vito Gelardi ("Individual Defendants") had, in effect, waived their attorney-client privilege with respect to whether they had told their former attorney, Jonathon Warner, about the sale of Individual Defendants' property located at 9 Woods End, Lake Harmony, PA 18624 (the "Woods End property"), (Defs.' Opp., Dkt. [498], at 1). The Court also indicated that after the stay in this case is lifted, the Court would direct Attorney Warner "to respond to Individual Defendants' allegation that they told him about the impending sale." (Dkt. 500, at 3.) Now that the stay has been lifted, the Court directs Attorney Warner, by August 1, 2025, to submit a sworn affidavit stating whether Individual Defendants ever advised him that they had sold the Woods End property and, if so, when and how that communication occurred. Ordered by Judge Pamela K. Chen on 7/18/2025. (JJB)

1:22-cv-01032-PKC-JRC Notice has been electronically mailed to:

Anthony Joseph Genovesi agenovesi@abramslaw.com, anthony@genovesi.us

Jamie Scott Felsen jamiefelsen@mmmlaborlaw.com

Melanie I. Wiener mwiener@abramslaw.com

Michael Joseph Alber mja@alberlegal.com, malber@alberlegal.com

Karen Hillary Charrington kcharrington@charringtonlawfirm.com

Kenneth C. Brown (Terminated) kcb@alberlegal.com

James Francis Valentino james@valentinolegal.com, valentino@clayro.com,
valentino.james@gmail.com

Emanuel Kataev emanuel@sagelegal.nyc, 4119461420@filings.docketbird.com,
daniellalevi@levilawny.com, ekesq2014@recap.email

Alan Smikun smikunlaw@gmail.com

Maria Zieher mzieher@zieherlaw.com

Eric Allen eric@allenlawyer.com

Safa Abdulrahim Gelardi safagelardi@gmail.com

1:22-cv-01032-PKC-JRC Notice will not be electronically mailed to:

IME Companions LLC
26118 Crosswood Trails Lane
Cypress, TX 77433